

Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402) 825-3811

LQA8200025

February 26, 1982

Mr. G. L. Madsen, Chief
Reactor Projects Branch
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/81-25

Dear Mr. Madsen:

This letter is written in response to your letter dated February 4, 1982 in which you indicated certain of our activities were not being conducted in full compliance with NRC requirements.

Following is a statement of violation and our response in accordance with 10CFR2.201.

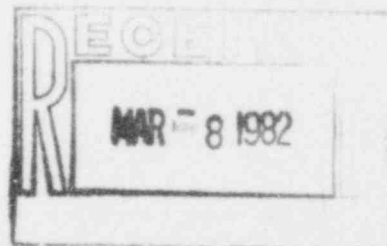
Statement of Violation

Failure to Follow Procedure for Making Temporary Changes to Procedures

Technical Specification 6.3.7 states, "Temporary changes to procedures which do not change the intent of the original procedure may be made, provided such changes are approved by two members of operating staff holding SRO licenses. Such changes shall be documented and subsequently reviewed by the Station Superintendent within one month."

CNS Administrative Procedure 1.3, Revision 6, Section 1.3.6, titled, "Temporary Changes to Procedures," states, "Occasionally it may become necessary to make temporary changes to a procedure to fulfill the requirements of a special situation. If such a situation should arise, temporary changes may be made to procedures applicable to operation pertaining to volumes 2, 3, 4, 5, 6, 7, and 10 by written consent of two individuals holding senior Operators licenses. Changes may be made to any procedure by written consent of two SORC members. All temporary changes to procedures must be reviewed by the Station Superintendent within one month."

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Mr. G. L. Madsen
February 26, 1982
Page 2.

Contrary to the above, on October 31, 1981, Surveillance Procedure 6.3.5.1, Revision 16, titled, "RHR Test Mode Surveillance Operation," was not performed as written, nor was a temporary procedure change written and approved to indicate the actual performed surveillance test valve lineup.

This constitutes a Severity Level V violation.

Discussion

The violation occurred as an oversight on the part of the operating crew conducting the procedure. During the test, the test engineer requested that the crosstie valve be opened to help him evaluate the system performance after completion of the RHR test line modification. Two SORC members (both Senior Licensed Operators) reviewed the request and agreed to the change in procedure. However, the change and approval were not indicated on the procedure. Since this deviation from the procedure was not noted on the procedure, further reviews of the completed surveillance procedure did not identify the deviation from the procedure. This oversight was not intentional, nor is it considered to be a common problem at Cooper Nuclear Station.

Corrective Steps Which Have Been Taken and Results Achieved

The temporary change was reviewed by SORC. The review identified no safety concerns with the change.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The failure to follow procedures was discussed in SORC Meeting on 2-26-82. It was stressed to all meeting attendees that thorough reviews must be conducted before changes to procedures are made and that those reviews and approvals must be documented.

This response will also be reviewed by licensed operators and test engineers to remind them of this requirement.

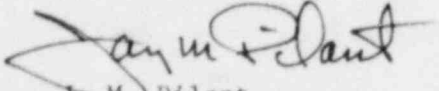
The Date When Full Compliance Will Be Achieved

Full compliance will be achieved when the above review is completed prior to April 1, 1982.

Mr. G. L. Madsen
February 26, 1982
Page 3.

If you have any questions regarding this response, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. M. Pilant", with a stylized flourish at the end.

J. M. Pilant
Division Manager of
Licensing and Quality Assurance

JMP:LCL:cg